

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP,

Plaintiff,

v.

AMAZON.COM, INC.,
AMAZON.COM SERVICES LLC, and
AMAZON WEB SERVICES, INC.,

Defendants.

Case No. 7:24-cv-00030-ADA-DTG

**DECLARATION OF JEREMY A. ANAPOL
IN SUPPORT OF AMAZON'S OPENING CLAIM CONSTRUCTION BRIEF**

I, Jeremy A. Anapol, declare and state as follows:

1. I am a partner in the law firm of Knobbe, Martens, Olson & Bear, LLP. I am counsel for Defendants Amazon.com, Inc., Amazon.com Services LLC, and Amazon Web Services, Inc. (collectively, “Amazon”) in this action and I appear *pro hac vice*. I make this declaration based on my personal knowledge and an investigation of the facts described herein. I have added highlighting to some exhibits listed below to make cited information easier to find.

2. Attached hereto as Exhibit 1 is a true and correct copy of an October 1, 2024 email sent by Plaintiff’s counsel to me.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff’s Disclosure of Proposed Claim Constructions. Plaintiff served these constructions on October 3, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of The Authoritative Dictionary of IEEE Standards Terms (“IEEE Dictionary”). This dictionary was published in 2000.

5. Attached hereto as Exhibit 4 is a true and correct copy of a January 15, 2010 Office Action Response contained in the file history of the ’058 patent. I obtained this office action response from the web site of the United States Patent and Trademark Office (“USPTO”).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of October, 2024 at Wilmington, Delaware.

/s/ Jeremy A. Anapol